



Florida Department of Environmental Protection

Central District
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Orlando, Florida 32803-3767

Rick Scott
Governor

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Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

Liberty Tire Recycling, LLC
1251 Waterfront Place, Suite 400
Pittsburgh, PA 15222

Authorized Representative:
Mr. Jeffrey D. Kendall, CEO

Air Permit No. 0090236-001-AC
Permit Expires: 06/30/2013
Site Name: Rockledge Mulch Plant
After-the-fact Minor Source Air
Construction Permit
Project Name: Mulch Processing Plant

This is the final **after-the-fact** air construction permit for a mulch processing operation and associated baghouse, Dustex Model 3600-54. The work is conducted at the Rockledge Mulch Plant (Standard Industrial Classification No. 3069). The facility is located in Brevard County at 270 Barnes Boulevard in Rockledge, Florida. The UTM coordinates are Zone 17, 528.24 km East and 3129.77 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

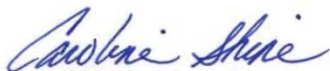
Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by

the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida



September 19, 2012

Caroline D. Shine
District Air Program Administrator
Central District

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on September 19, 2012 to the persons listed below.

Mr. Jeffrey D. Kendall, CEO, Liberty Tire Recycling, LLC (**kendall@libertytire.com**)

Mr. James Kington, Liberty Tire Recycling, LLC (**jkington@libertytire.com**)

Mr. Scott A. McCann, P.E., Golder Associates, Inc. (**Scott_McCann@GOLDER.com**)

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

September 19, 2012

(Date)

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Rockledge Mulch Plant

Liberty Tire Recycling, LLC operates a rubber mulch manufacturing facility. The facility receives shredded rubber derived from recycled tires and processes it into landscaping mulch of various colors. The facility emits uncontrolled emissions of particulate matter (PM) that are above permitting thresholds. The facility also emits volatile organic compounds (VOCs) and hazardous air pollutants (HAP), specifically methylene diphenyl diisocyanate (MDI), from the mulch coating operation. The VOC/HAP emissions from the coating operation are well below permitting thresholds.

Project Description and Proposed Emission Unit

This project is the **after-the-fact** initial construction permit for this facility.

This project will create the following emissions units.

Facility ID No. 0090236	
ID No.	Emission Unit Description
001	Mulch Processing Plant with Baghouse

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Exempt Emission Units/Activities

- Coating Operation: VOC/HAP (methylene diphenyl diisocyanate (MDI)) emissions of 0.008 tons/yr are well below permitting threshold, Rule 62-210.300(3), F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a true minor source.

PERMIT HISTORY/AFFECTED PERMITS

None

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
Air Resource Management Section
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
Telephone: 407-897-4100

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Resource Management Section (see above mailing address and phone number).
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

7. Application for Non-Title V Air Operation Permit: This permit authorizes construction or modification of the permitted emissions unit(s) and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least **90 days prior to expiration of this permit**. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
- b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
- c. request for alternate procedure approval specified in Specific Condition No. **A.11.**, if applicable;
- d. copies of the most recent compliance test reports required by Specific Condition No. **A.12.**, if not previously submitted; and
- e. copies of the most recent two months of records/logs specified in Specific Condition No. **A.13.**

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), 62-210.900, and 62-297.620(4) F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	<p>Mulch Processing Plant with Baghouse</p> <p>Shredded tire rubber feedstock is delivered to the facility via truck. The facility's processing storage building has enlarged plastic warehouse curtains over the west side door to accommodate truck entry. The building has an interior bunker to contain stored feedstock and windscreens over the open areas on the north side of the building. If space permits within the building, the trucks are off-loaded and feedstock is stored inside the building. If the storage building is full, the feedstock is off-loaded and stored outside in bunkered piles that are wetted with sprinklers to control fugitive PM emissions.</p> <p>Front-end loaders are used to transfer the rubber feedstock from storage to the two (2) enclosed in-feed hoppers that are vented to the baghouse (Dustex Model 3600-54). From the in-feed hoppers, feedstock moves inside the Processing and Shipping Building for granulation. The facility has two (2) granulators that are both vented to the baghouse. Reject wire recovered from the granulation process is conveyed outside the building to a receiving bin.</p> <p>From the granulation process, shredded rubber of the proper size (undersized rubber material is conveyed inside the processing building for bagging and storage in 1-ton super sacks prior to sale as fuel) is conveyed within the Processing and Shipping Building to the coating process.</p> <p>The coating process consists of seven (7) mixing vessels, each with a 6,000-pound capacity. Polyurethane coatings of the desired color are poured directly into the vessels. These coatings contain up to 10 percent of mixed isomers of MDI that through polymerization become part of the coating and only a negligible amount is emitted into the atmosphere. The facility also uses coating additives.</p> <p>The coatings applied in the mixing vessels cure in approximately 30 minutes and once cured, the coated mulch is then transferred by conveyor and front-end loader inside the Processing and Shipping Building to the bagging operation.</p>

PERFORMANCE RESTRICTIONS

- A.1. Restricted Operation:** The hours of operation are limited to 6,000 hours per year.
[Permit Application dated 07/23/2012; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- A.2. Permitted Capacity:** The total process rate shall not exceed 122,640 tons per any consecutive 12-months period.
[Rule 62-210.200(PTE), F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

EMISSIONS STANDARDS

- A.3. Visible Emissions (VE):** Visible emissions from each particulate emissions source shall not be equal to or greater than 20 percent opacity.
[Permit Application dated 07/23/2012; Rule 62-296.320(4)(b), F.A.C.]
- A.4. Particulate Matter (PM) Emissions:** Particulate emissions shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).
[Permit Application dated 07/23/2012; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]
- A.5. Unconfined Particulate Matter (PM) Emissions:** No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include, but are not limited to, the following:
- a. Vacuum street sweeping.
 - b. Enclosure of the primary shredded rubber delivery using the existing building fitted with wind screens and unloading bunker.
 - c. Enclosure of both rubber receiving bins with enclosures vented to the dust collector.
 - d. Fence screening and vegetation.
 - e. Limiting the speed of vehicles on facility property.
 - f. Moving undersized rubber collection system to inside the Processing and Shipping Building, where applicable.
 - g. Use of water sprinklers on outside storage piles and wire reject bin.

[Permit Application dated 07/23/2012; Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

- A.6. Initial VE and PM Compliance Tests:** The emissions unit shall be tested to demonstrate initial compliance with the emissions standards. The initial **VE and PM** tests shall be conducted **no later than 90 days** after issuance of this permit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]
- A.7. Compliance Tests After Initial Testing:** During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for **VE or PM** specified in Specific Condition No. **A.3. and A.4.**

{Permitting Note: See Specific Condition No. A.11. for Request for approval of alternate procedure for PM testing.}

[Rule 62-297.310, F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

A.8. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.9. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

EPA Method	Description of Method and Comments
5	<u>Determination of Particulate Matter Emissions from Stationary Sources: The sampling time and volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).</u>
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.401, F.A.C.]

NOTIFICATION REQUIREMENTS

A.10. Test Notification: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.11. Request for Approval of Alternate Procedure for PM testing and VE standard: In the case of an emissions unit which has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse, the Department may waive any particulate matter compliance test requirements for such emissions unit specified in any otherwise applicable rule, and specify an alternative standard of 5% opacity. The waiver of compliance test requirements for a particulate emissions unit equipped with a baghouse, and the substitution of the visible emissions standard, shall be specified in the permit issued to the emissions unit. If the department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that compliance be demonstrated by the test method specified in Specific Condition No. **A.9.**
[Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

RECORDS AND REPORTS

A.12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

A.13. Monthly Recordkeeping Requirements: In order to demonstrate compliance with Specific Condition Nos. **A.1. and A.2.**, the permittee shall maintain a monthly log at the facility for a period of at least five (5) years from the date the data is recorded. The log, at a minimum, shall contain the following:

Monthly

- a) Designation of the month and year of operation for which the records are being tabulated;
- b) Consecutive 12-month total of operational hours and mulch processed (tons); and
- c) One month totals of operational hours and mulch processed (tons).

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]